

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

DARRELL G. OBER,

Plaintiff

vs.

PAUL EVANKO, MARK CAMPBELL,
THOMAS COURY, JOSEPH WESTCOTT,
HAWTHORNE CONLEY,

Defendants

NO. 1:CV-01-0084
(Judge Caldwell)

CIVIL ACTION - LAW

JURY TRIAL DEMANDED

FILED
HARRISBURG

APR 24 2002

MARY E. D'ANDREA, CLERK

DEFENDANTS' MOTION FOR ENLARGEMENT OF TIME
TO FILE SUMMARY JUDGMENT MOTION

DEPUTY CLERK

AND NOW, come the defendants, by and through their counsel, Joanna N. Reynolds, Assistant Counsel, and Syndi Guido, Deputy General Counsel, and make this motion for an enlargement of time to file the defendants' summary judgment motion, stating in support thereof the following:

1. By order of this court, pre-trial motions, including summary judgment motions, are due to be filed by April 29, 2002.
2. By order of this court, after motion by plaintiff's counsel, discovery in this case was extended for a three week period, to April 22, 2002.
3. Discovery in this case proceeded through the last day of discovery, April 22, 2002, and many depositions were taken by the plaintiff in the last month of discovery.
4. Defendants have not received some of the transcripts of several significant depositions in this case, including defendants Evanko and Coury. A request

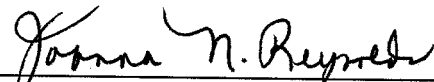
has been made to expedite those transcripts. Defendants' counsel expects to receive these transcripts sometime next week.

5. Portions of the transcripts noted above will be utilized and relied upon in Defendants' Motion for Summary Judgment.

6. The enlargement of time sought in this case should not affect the scheduling of this case for trial in June, 2002.

WHEREFORE, it is respectfully requested that this Honorable Court grant an enlargement of time of one week, until May 6, 2002, to file the summary judgment motion in this case.

Respectfully submitted,



JOANNA N. REYNOLDS
Assistant Counsel
Attorney I.D. #37436
Pennsylvania State Police
1800 Elmerton Avenue
Harrisburg, PA 17110
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SYNDI L. GUIDO
Deputy General Counsel

BARBARA L. CHRISTIE
Chief Counsel
Pennsylvania State Police

Dated: April 24, 2002

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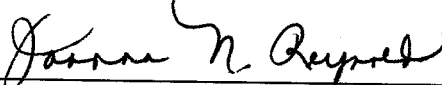
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CERTIFICATION OF CONCURRENCE

Pursuant to Local Rule 7.1, the undersigned counsel certifies that concurrence in this motion has been given from the plaintiff.



JOANNA N. REYNOLDS
Assistant Counsel
Pennsylvania State Police

Dated: April 24, 2002

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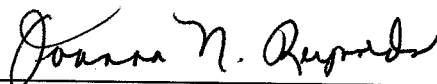
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CERTIFICATE OF SERVICE

I hereby certify that on this date a copy of Defendants' Motion for Enlargement of Time to File Summary Judgment Motion was served on plaintiff's counsel, by first-class mail, addressed as follows:

Don Bailey, Esquire
4311 North 6th Street
Harrisburg, PA 17110



Joanna N. Reynolds
Assistant Counsel
Pennsylvania State Police
1800 Elmerton Avenue
Harrisburg, PA 17110

Dated: April 24, 2002